

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor

July 31 2002

CERTIFIED MAIL # 7102 0243 6841 0000 0109 Robert Schutte Operations Manager Lamb Weston, Inc. P.O. Box 489 American Falls, ID 83211

RE:

AIRS Facility No. 077-00017, Lamb Weston Inc., American Falls

(Final Tier II Operating Permit and Permit to Construct)

Dear Mr. Schutte:

The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No. 077-00017 for Lamb Weston Inc., in accordance with IDAPA 58.01.01.200 et seq. and IDAPA 58.01.01.400 et seq., Rules for the Control of Air Pollution in Idaho.

The enclosed permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. This permit is effective immediately. Modification to and/or renewal of this permit shall be requested in a timely manner in accordance with the *Rules*.

Please be advised that the consent order issued on December 18, 2001 is now terminated upon the issuance of this permit.

Tiffany Floyd of the Pocatello Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends attendance of your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (Rules of Administrative Procedure Before the Board of Environmental Quality). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, the Department encourages you to contact us to discuss any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Mike Simon at (208) 373-0502 or msimon@deq.state.id.us.

Sincerely

Katherine B. Kelly Administrator

Air Quality Division

KK/SC/sm T2-010320 G:\AIR PERMITS\T 2\LAMB WESTON AMFALLS\FINAL PREP\T2-010320 FINAL PERMIT LTR.DOC

Enclosure

CC:

Tiffany Floyd, Pocatello Regional Office Joan Lechtenberg, Air Quality Division

Sherry Davis, Technical Services Laurie Kral, EPA Region 10

July 12, 2002

STATE OF IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY RESPONSE TO PUBLIC COMMENTS ON DRAFT TIER II AIR QUALITY PERMIT and PERMIT TO CONSTRUCT FOR LAMB-WESTON INC., AMERICAN FALLS, IDAHO

Introduction

As required by IDAPA 58.01.01.404.01 (*Rules for the Control of Air Pollution in Idaho*), the Idaho Department of Environmental Quality (DEQ) provided for public comment, including offering an opportunity for a hearing, a Tier II operating permit proposed for the Lamb-Weston, Inc. facility located in American Falls, Idaho. Public comment packages, which included the application materials, and proposed permit and technical memorandum, were made available for public review at the DEQ's Boise Regional Office, and DEQ's State Office in Boise. A copy of the proposed permit and technical memorandum was also posted on DEQ's Web site. The public comment period was provided from May 1, 2002 through June 1, 2002, with no public hearing requested. Those comments regarding the air quality aspects of the draft permit are provided below with DEQ's response immediately following.

Public Comments and DEQ Responses

The only comments received were from Lamb-Weston.

- Comment: Section 4.1 on Page 12 requires the pressure drop and scrubbing media flow rate to be recorded daily for the Ducon scrubber. We would like the requirement to be changed to weekly to be consistent with the other scrubbers in the permit. Weekly is also the recording interval for the Ducon scrubber in the current permit.
 - Response: The recording interval for all the equipment which is subject to an hourly emission rate limitation, will be recorded on a daily basis to assure compliance. The permit will be updated for consistency.
- Comment: Section 7.8 on Page 18 requires recording of the pressure drop across the Reyco Roto-Clones. We would like this condition to be removed since there is not an associated Operating Requirement for the Pressure drop across the Roto-Clones and the Roto-Clones do not have an installed means of measuring the pressure drop.
 - Response: Since there is no provision in the manufactures O&M manual and since the roto-clones have no installed means of measuring the pressure drop, this requirement will be removed.
- Comment: We believe some of the numbers in Tables 8.1 and 8.2 should be different. Tables showing the changed numbers are attached.
 - Response: The tables will be updated to reflect the new numbers. The
 numbers, which were originally used in the permit, were from an older version of the
 permit application information; the new numbers represent the most accurate data
 available.



Air Quality TIER II OPERATING PERMIT and PERMIT TO CONSTRUCT

PERMIT NO.: 077-00017

AQCR: 061

CLASS: SM

SIC:

2037

ZONE:

12

State of Idaho
Department of Environmental Quality

UTM COORDINATE (km):

343.4,4736.2

1. PERMITTEE

Lamb Weston, Inc.

2. PROJECT

Tier II Operating Permit and Permit to Construct

3. MAILING ADDRESS P. O. Box 489	CITY American Falls	STATE ID	ZIP 83211
FACILITY CONTACT Robert Bloom	TITLE Services Manager	TELEPHONE (208) 226-23	
RESPONSIBLE OFFICIAL Robert Schutte	TITLE Operations Manager	TELEPHONE (208) 226-230	
6. EXACT PLANT LOCATION 42° 46 min 10 sec N, 112° 54 min	30 sec W	COUNTY Power	

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Production of Frozen and Dehydrated Potato Products

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200 et seq. and IDAPA 58.01.01.400, et seq. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 of the *Rules*.

DATE ISSUED:

JULY 31, 2002

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY

DEPARTMENT OF ENVIRONMENTAL QUALITY

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LIST OF ACRONYMS

ACFM Actual Cubic Feet Per Minute

AFS AIRS Facility Subsystem

AIRS Aerometric Information Retrieval System

AQCR Air Quality Control Region

BACT Best Available Control Technology
CFR Code of Federal Regulations

CO Carbon Monoxide

DEQ Idaho Department of Environmental Quality

dscf Dry Standard Cubic Feet

EF Emission Factor

EPA United States Environmental Protection Agency

gpm Gallons Per Minute gr Grain (1 lb = 7,000 grains) HAPs Hazardous Air Pollutants

IDAPA Idaho Administrative Procedures Act

km Kilometer Ib/hr Pound Per Hour

MACT Maximum Available Control Technology

MMBtu Million British thermal units

NESHAP Nation Emission Standards for Hazardous Air Pollutants

NO₂ Nitrogen Dioxide NO_X Nitrogen Oxides

NSPS New Source Performance Standards

O₃ Ozone

OP Operating Permit PM Particulate Matter

PM₁₀ Particulate Matter with an Aerodynamic Diameter of 10 Micrometers or Less

ppm Parts Per Million

PSD Prevention of Significant Deterioration

PTC Permit To Construct
PTE Potential To Emit

SCC Source Classification Code scf Standard Cubic Feet SIP State Implementation Plan

SO₂ Sulfur Dioxide

TSP Total Suspended Particulates

T/yr Tons Per Year um Micrometers

VOC Volatile Organic Compound

Permittee: Lamb Weston, Inc.

, Inc. Date Issued: JULY 31, 2002

Location: American Falls, Idaho

1. PERMIT SCOPE

Purpose

1.1 The purpose of this Tier II operating permit and Permit to Construct is to incorporate the requirements of existing permits, establish facility emissions below Title V permitting thresholds and to comply with National Ambient Air Quality Standards.

- 1.2 This permit incorporates and modifies the following permits. The consent order issued December 18, 2001 is terminated automatically upon the issuance of this permit
 - PTC No. 077-00017 issued October 8, 2000, for the line 2 dryer replacement.
 - PTC No. 083-00062 issued August 8, 2000, for the line 2 dryer replacement.
 - PTC No. 083-00062 issued June 30, 2000, for the Co-Products line split.
 - Tier II Permit No. 077-00017 issued June 2, 2000.
 - Tier II Permit No. 077-00017 issued February 23, 1996.
 - Tier II Permit No. 077-00017 issued December 27, 1995.

Regulated Sources

1.3 Table 1.1 below lists all regulated emissions sources in this permit.

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Sections	Source Description	Emissions Control(s)				
3	Frozen Fried Product Line 1	Reyco Scrubber (2500)				
· 4	Frozen Fried Product Line 2	Ducon Scrubber (UW-3)				
		Ken Bratney Co. Kice 21-8 Dust Collector				
5	Dehydrated (flake) Product Line	Pneumafil Corporation Fabric Filter (6.5-92-6				
		Mikro-Pulsaire Filter				
6	Boilers No.1, No. 2, No. 3, No. 4					
7	Specialized Product Lines No. 3, and No. 5	Reyco Scrubbers				

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2. FACILITY-WIDE CONDITIONS

Facility Emissions

2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

2.2 Unless specified elsewhere in this permit, the permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.405.01, 07, 5/1/94]

2.3 Unless specified elsewhere in this permit, the permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint; the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.405.01, 07, 5/1/94]

Odors

2.4 No person shall allow, suffer, cause, or permit the emissions of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94 (Federally enforceable; however, this provision will become state-only enforceable upon removal from the SIP)]

2.5 Unless specified elsewhere in this permit, the permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.405.01, 07 (State-only), 5/1/94]

Visible Emissions

2.6 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

2.7 The permittee shall conduct a monthly, facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. If any visible emissions are present from any point of emissions, the permittee shall take appropriate corrective action as expeditiously as practicable. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action, and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall keep records of the results of each monthly visible emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions.

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and the date corrective action was taken. A compilation of the most recent five years of data shall be kept onsite and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.130-136, 4/5/00]

Excess Emissions

2.8 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Fuel Burning Operating Requirements

2.9 The combined combustion of all fuels from all sources shall not cause oxides of nitrogen (NO_x) or carbon monoxide (CO) to be emitted to the atmosphere in quantities greater than 99 tons per year (T/yr) for each pollutant for any consecutive 12-month period.

[IDAPA 58.01.01.405.01, 5/1/94]

Fuel Consumption Monitoring and Recording

- 2.10 The permittee shall monitor and record the following parameters to verify compliance with the permit. The records shall be kept at the facility for the most recent five-year period and shall be made available to Department representatives upon request.
 - Calendar date and total amount of natural gas burned at the entire facility per month and per any
 consecutive 12-month period.
 - Calendar date and total amount of natural gas burned in Boiler No. 1, Boiler No. 2, and Boiler No. 3
 per month and per any consecutive 12-month period.
 - Calendar date and amount of vegetable oil burned in Boiler No. 1, Boiler No. 2, and Boiler No. 3 per month and per any consecutive 12-month period.
 - Calendar date and amount of diesel burned in Boiler No. 1, Boiler No. 2, and Boiler No. 3 per month and per any consecutive 12-month period.
 - Fuel analyses for sulfur content of all 0.05% diesel burned at the facility shall be obtained for each lot of diesel received.

[IDAPA 58.01.01.405.01, 5/1/94]

2.11 The permittee shall calculate monthly the NO_x and CO emissions for the previous 12-month period to ensure NO_x and CO emissions do not exceed 99 T/yr. The records shall be submitted to the Department every 12 months, kept at the facility for the most recent five-year period, and be made available to Department representatives upon request.

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2.12 NO_x calculations shall be made using the following table:

Table 2.1 NO_X EMISSIONS CALCULATIONS

Sources	Fuel Usage (previous 12 months)	Emission Factor	Emissions
Boiler No. 1 Natural Gas	MMCF* x	45 lb/MMCF =	lbs
Rest Of The Plant Natural Gas	MMCF x	100 lb/MMCF =	lbs
Boiler No. 1 Diesel	Gallons x	10 lb/1000 gal =	lbs
Boiler No. 2 & Boiler No. 3 Diesel	Gallons x	20 lb/1000 gal =	lbs
Boiler No. 1 Vegetable Oil	Gallons x	12.5 lb/1000 gal =	lbs
Boiler No. 2 & No. 3 Vegetable Oil	Gallons x	25 lb/1000 gal =	lbs
	·	Total =	lbs
		Otal =	Tons

a Million cubic feet

[IDAPA 58.01.01.405.01, 5/1/94]

2.13 CO calculations shall be made using the following table:

Table 2.2 CO EMISSIONS CALCULATIONS

Sources	Fuel Usage (previous 12 months)	Emission Factor	Emissions		
Boiler No. 1 Natural Gas	MMCF* x	84 lb/MMCF =	lbs		
Rest of the Plant Natural Gas	MMCF x	84 lb/MMCF =	lbs		
Boiler No. 1 Diesel	Gallons x	5 lb/1000 gal =	lbs		
Boiler No. 2 & Boiler No. 3 Diesel	Gallons x	5 lb/1000 gal =	lbs		
Boiler No. 1 Vegetable Oil	Gallons x	5 lb/1000 gal =	lbs		
Boiler No. 2 & No. 3 Vegetable Oil	Gallons x	5 lb/1000 gal =	lbs		
Total =					
] (otal =		Tons		

[&]quot; Million cubic feet

[IDAPA 58.01.01.405.01, 5/1/94]

General Operating Requirements

- 2.14 The permittee shall monitor and record, both daily and annually, the finished potato product output of the Dehydrated Line, Line No. 1, Line No. 2, Specialized Product Line No. 3, and Specialized Product Line No. 5 to demonstrate compliance with the following throughput limits. Output shall be recorded as T/day and tons per any consecutive 12-month period. The respective output for each day may be determined using monthly output records. Records of the most recent five-year period shall be maintained onsite and shall be made available to Department representatives upon request.
 - The Dehydrated line shall have a total maximum output of 50 T/day, or 16,650 tons per any consecutive 12-month period.
 - Line No. 1 shall have a total maximum output of 945 T/day, or 301,905 tons per any consecutive 12month period.

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 Line No. 2 shall have a total maximum output of 510 T/day, or 167,790 tons per any consecutive 12month period.

- Specialized Product Line No. 3 shall have a total maximum output of 265 T/day, or 87,400 tons per any consecutive 12-month period.
- Specialized Product Line No. 5 shall have a total maximum output of 130 T/day, or 42,800 tons per any consecutive 12-month period.

[IDAPA 58.01.01.211.01, 5/1/94] [IDAPA 58.01.01.405.01, 5/1/94]

Open Burning

2.15 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

[IDAPA 58.01.01.600-616, 5/1/94]

Test Methods

2.16 If testing is required, the permittee shall use the following test methods described in Table 2.3 to measure the pollutant emissions:

Table 2.3 TEST METHODS

Pollutants	Test Methods	Special Conditions
PM ₁₀	EPA Method 201.a. ¹ , 202	
PM	EPA Method 5 ¹	
NOx	EPA Method 7 ¹	
SO ₂	EPA Method 6 ¹	
СО	EPA Method 10 ¹	
voc	EPA Method 251	
Opacity	EPA Method 9 ¹	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

Or Department-approved alternative in accordance with IDAPA 58.01.01.157

Performance Test Report

2.17 In accordance with IDAPA 58.01.01.157.04, the permittee shall submit a written report of the performance test results to the Department within 30 days of test completion.

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Reports and Certifications

2.18 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance Department of Environmental Quality Pocatello Regional Office 444 Hospital Way #300 Pocatello, ID 83201 (208) 236-6160

Permittee:

Lamb Weston, Inc.

Date Issued:

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Location:

American Falls, Idaho

3. FROZEN FRIED PRODUCT LINE 1

3.1 Process Description

A predetermined blend of clean, raw potatoes are drawn from the holding bays and are sized and peeled. The peeled potatoes are then trimmed, preheated, cut, wet-graded, sorted, and then fed to the defect-removal equipment, where defective material is removed and routed to the hopper waste. Undersized cuttings are routed to the dehydrated flake product line.

The sorted product is blanched in hot water then fed to a steam-heated dryer, from which it leaves in a "nearly dry" state. From the dryer, the potato product goes to the fryer, then to a freeze tunnel and frozen graders. Finally, the product goes to packaging, after which it is placed on pallets and then put in cold storage.

Emissions from the Line 1 fryer exit the process through a Reyco scrubber. The scrubber uses a water droplet bath to remove oil droplets in the fryer exhaust for subsequent collection in the water sump.

The blancher and the peeler vent only process steam.

3.2 Control Description

Line 1 Steam-heated Dryers

Emissions from the steam-heated dryers are uncontrolled.

Line 1 Deluge Fryer

Emissions from the Line 1 fryer are controlled by a scrubber with the following specifications:

Manufacturer:

Reyco

Model Number:

2500

Max. Inlet Flow Rate:

17.500 acfm

Max. Outlet Flow Rate:

16.000 acfm

Pressure Drop:

0.5 to 3.5 inch water

Emissions Limits

3.3 Emissions from the Frozen Fried Product Line 1 Reyco scrubber shall not exceed any limits listed in the appendices of this permit.

[IDAPA 58.01.01.405.01, 5/1/94]

Operating Requirements

3.4 Monitoring Equipment

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications, the equipment that continuously measures the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment.

Permittee: Lamb Weston, Inc. Date Issued: JULY 31, 2002

Location: American Falls, Idaho

3.5 Operations and Maintenance Manual Requirements

The operations and maintenance (O&M) manual for the air pollution control devices, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit, shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

3.6 Pressure Drop Across Air Pollution Control Devices

The pressure drop across the air pollution control devices shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

3.7 Scrubbing Media Flow Rate

The scrubbing media pump pressure to the air pollution control devices shall be maintained within manufacturer's and O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

3.8 Line 1 shall not be operated without the associated Reyco scrubbers.

[IDAPA 58.01.01.405.01, 5/1/94]

Monitoring and Recordkeeping Requirements

3.9 Air Pollution Control Equipment

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to Department representatives upon request.

- Pressure drop across the air pollution control device, once daily.
- The scrubbing pump pressure to the air pollution device, once daily.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

Permittee: Lamb We

Lamb Weston, Inc.

Date Issued:

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Location:

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4. FROZEN FRIED PRODUCT LINE 2

4.1 Process Description

Raw potatoes are cleaned, sized, and peeled by a steam peeler. The peeled potatoes are then trimmed, cut, wet-graded, sorted, and passed through defect removal equipment, then blanched (partially cooked) by immersion in hot water. A natural gas-fired dryer then dries potato products. From the dryer, the products are transferred to the Line 2 fryer. Immediately after frying, the product is frozen, graded, packaged, and stored in a warehouse.

Emissions from the Line 2 fryer exit the process through a Ducon scrubber. The scrubber uses a water droplet bath to remove oil droplets in the fryer exhaust for subsequent collection in the water sump.

The peeler and blancher vent only process steam.

4.2 Control Description

Line 2 Natural Gas-fired Dryers

Emissions from the Line 2 natural gas-fired dryer are uncontrolled.

Line 2 Deluge Fryer

A scrubber with the following specifications controls emissions from the Frozen Fried Product Line 2:

Manufacturer:

Ducon

Model Number:

UW-3. Size 90

Max. Inlet Flow Rate:

26,000 acfm

Max. Outlet Flow Rate:

23,794 acfm

Pressure Drop:

0.0 to 1.0 inch water

Wet Scrubber Flow:

20 to 60 gpm

Emissions Limits

4.3 Emissions from the Line 2 Ducon scrubber shall not exceed any limits listed in the appendices of this permit. [IDAPA 58.01.01.405.01, 5/1/94]

Operating Requirements

4.4 Fuel Specification

The Frozen Fried Product Line 2, dryer (natural gas-fired) and fryer, shall burn natural gas exclusively.

[IDAPA 58.01.01.405.01, 5/1/94]

4.5 Monitoring Equipment

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications, the equipment that continuously measures the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment.

Permittee:

Lamb Weston, Inc.

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Location:

American Falls, Idaho

Operations and Maintenance Manual Requirements 4.6

The O&M manual for the air pollution control devices, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit. shall remain onsite at all times and shall be made available to Department representatives upon request.

IIDAPA 58.01.01.405.01, 5/1/941

Pressure Drop Across Air Pollution Control Devices 4.7

The pressure drop across the air pollution control devices shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer's and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

Scrubbing Media Flow Rate 4.8

The scrubbing media flow rate to the air pollution control devices shall be maintained within manufacturer's and O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

Line 2 shall not be operated without the associated Ducon scrubbers. 4.9

[IDAPA 58.01.01.405.01, 5/1/94]

Monitoring and Recordkeeping Requirements

Air Pollution Control Equipment 4.10

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to Department representatives upon request.

- Pressure drop across the air pollution control device, once daily.
- The scrubbing media flowrate to the air pollution device, once daily.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

Permittee:

Lamb Weston, Inc.

Date Issued:

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Location:

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5. DEHYDRATED (FLAKE) PRODUCT LINE: DRUM DRYERS 1 AND 2, KICE FILTER, PNEUMAFIL FILTER, AND MIKRO-PULSAIRE FILTER

5.1 Process Description

Raw potato screen-out and hydro-sieve and the undersized cuttings from line 1 are routed to the flake holding tank. From the holding tanks, raw potatoes are transferred to the flake blancher, flake chiller, then cooked in the flake cooker where steam is injected and additives are introduced.

The cooked product is ground to a mash and fed to one of two drum dryers, where it is rolled into a fine sheet of dehydrated potato. The sheet is broken into smaller portions, transported through one of two cyclones, and then is either put into a tote for later use or run to a hammer mill. The hammer mill grinds the dehydrated product to the desired coarseness for either potato flakes or flour. From the hammer mill, the product passes to the Kice collection system where different densities are separated for packaging.

5.2 Control Description

Drum Dryer No. 1 and Drum Dryer No. 2

Emissions from both of the drum dryers are uncontrolled.

Kice Collection/Sizing System

Emissions from the Kice collection system (flake sizing) are controlled by the Kice fabric filter with the following specifications:

Manufacturer:

Ken Bratney Co.

Model: Air/Cloth Ratio: Kice 21-8 Dust Collector

7.9 to 1

Packaging System

Fugitive emissions from the packaging system and the flake process area are collected and controlled by a fabric filter with the following specifications:

Manufacturer:

Pneumafil Corporation

Model:

6.5-92-6

Air/Cloth Ratio:

8.0 to 1

Micro-Pulsair

Fugitive emissions from the hammer mill area of the flake process area are collected and controlled by a fabric filter with the following specifications:

Manufacturer:

Pulverizing Machinery

Model:

Mikro-Pulsaire Dust Collector

Air/Cloth Ratio:

8.0 to 1

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Emissions Limits

5.3 Emissions from the Kice, Pneumafil, and Mikro-Pulsaire fabric filters shall not exceed any limits listed in the appendices of this permit.

[IDAPA 58.01.01.405.01, 5/1/94]

Operating Requirements

5.4 The Kice, Pneumafil, and Mikro-Pulsaire filters shall at all times be maintained in good working order and shall be operated as efficiently as practical.

[IDAPA 58.01.01.405.01, 5/1/94]

5.5 The permittee shall develop an O&M manual for the Kice, Pneumafil, and Mikro-Pulsaire filters, which will be followed to demonstrate that the filters are operated as efficiently as practical. The manuals shall include operating pressure drop requirements.

[IDAPA 58.01.01.405.01, 5/1/94]

5.6 Monitoring Equipment

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications, the equipment that continuously measures the pressure differential across the air pollution control equipment.

[IDAPA 58.01.01.405.01, 5/1/94]

5.7 Operations and Maintenance Manual Requirements

The O&M manual for the air pollution control devices, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit, shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/941]

5.8 Pressure Drop Across Air Pollution Control Devices

The pressure drop across the air pollution control devices shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

Monitoring and Recordkeeping Requirements

5.9 Air Pollution Control Equipment

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to Department representatives upon request.

- Pressure drop across the air pollution control devices, once daily.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

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6. BOILER NO. 1, BOILER NO. 2, BOILER NO. 3, BOILER NO. 4, AMUS, AND SPACE HEATERS

6.1 Process Description

There are three boilers for the supply of the facility's process steam and one boiler for heat supply to the facility's fire system water source to prevent freezing during winter.

There are various sizes of air makeup units (AMUs) and other space heating equipment.

6.2 Control Description

Emissions from Boilers No. 1, No. 2, No. 3, and No. 4 are uncontrolled.

Emissions from the AMUs and space heating equipment are uncontrolled.

Emissions Limits

6.3 Boiler No. 1, Boiler No. 2, Boiler No. 3, and Boiler No. 4

Emissions from the boilers exhaust stacks shall not exceed emissions limits listed in the appendices of this permit.

[IDAPA 58.01.01.405.01, 5/1/94]

Fuel Burning Requirement

PM and PM₁₀ emissions limits from Boiler No. 1, Boiler No. 2, Boiler No. 3, and Boiler No. 4 exhaust stacks shall not exceed 0.015 gr/dscf corrected to 3% oxygen by volume when burning natural gas, or 0.050 gr/dscf of effluent gas adjusted to 3% oxygen when diesel or vegetable oil is combusted as per IDAPA 58.01.01.675.

[IDAPA 58.01.01.675]

Operating Requirements

6.4 Boilers No. 1, No. 2, No. 3, and No. 4

Fuel Specification

Boilers No. 1, No. 2, No. 3, shall burn natural gas, 0.05% diesel fuel with 0.05% sulfur or less, or vegetable oil. Boiler No. 4 shall burn natural gas exclusively.

[IDAPA 58.01.01.405.01, 5/1/94]

6.5 AMUs and Space Heating Equipment

Fuel Specification

All AMUs and space heating equipment shall burn natural gas fuel exclusively.

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Monitoring and Recordkeeping Requirements

6.6 Operation Parameters Monitors

The permittee shall record the parameters required in Permit Conditions 2.10 thru 2.13 to verify compliance with this permit. The records shall be kept at the facility for the most recent five-year period and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

Performance Test

6.7 PM₁₀ Performance Tests

The permittee shall conduct a performance test to measure PM₁₀ from the Boiler No.1 stack while burning only vegetable oil within 180 days of installation of the capability to burn vegetable oil, and at a minimum of once every five years thereafter. The permittee shall use the results of the PM₁₀ performance tests to establish a PM₁₀ emissions factor that shall be used to estimate emissions from each boiler at the facility when burning vegetable oil and to determine compliance with the PM₁₀ emissions limits specified in this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance with this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 9 of this permit, and the following requirements:

- Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157.
- The amount of vegetable oil burned during the test and the steam output of Boiler No.1 shall be recorded during each performance test.

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SPECIALIZED PRODUCT LINE 3 AND LINE 5 7.

7.1 Process Description

Raw potatoes from the even-flow hoppers are routed to a steam peeler and barrel washer to remove the peelings. The potatoes are then inspected, scrubbed, polished, and cut. After cutting, the potatoes are blanched and then dryed or retrograded.

Line 3 products pass through a steam-heated retrograde which may be operated to dry the product, and may pass through a natural gas-fired roaster depending on the product being produced.

Line 5 products pass through a natural gas heated retrograde which is operated to dry the product, and then pass through two natural gas-fired fryers that operate in parallel.

The specialized products are then sent to a freeze tunnel. After freezing, the specialized products are sorted, packaged, placed on pallets, and then sent to the cold storage area.

The peeler and the blancher vent only process steam.

7.2 Control Description

Line 3 Retrograde

Emissions from the Line 3 retrograde are uncontrolled.

Line 3 Roaster

Emissions from the Line 3 roaster are uncontrolled.

Line 5 Retrograde

Emissions from the Line 5 retrograde are uncontrolled.

Line 5 Fryer 1

Emissions from the Line 5 fryer 1 are controlled by a scrubber with the following specifications:

Reyco

Manufacturer: Model Number:

Type W Roto-Clone

Max. Outlet Flow Rate:

2,800 acfm

Pump Pressure:

60 to 90 psi

Line 5 Fryer 2

Emissions from the Line 5 fryer 2 are controlled by a scrubber with the following specifications:

Manufacturer:

Reyco

Model Number:

Type W Roto-Clone

Max. Outlet Flow Rate:

2.800 acfm

Pump Pressure:

60 to 90 psi

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Emissions Limits

7.3 Reyco Exhaust Stacks

Emissions from the Reyco stacks shall not exceed emissions limits listed in the appendices of this permit.

[IDAPA 58.01.01.405.01, 5/1/94]

Operating Requirements

- 7.4 The Line 3 roaster, Line 5 retrograde and Line 5 fryers 1 and 2 shall burn natural gas exclusively.

 [IDAPA 58.01.01.405.01, 5/1/94]
- 7.5 The scrubbing media pump pressure to the Reyco wet scrubbers shall be maintained within the O&M Manual specifications.

[IDAPA 58.01.01.405.01, 5/1/94]

7.6 Documentation of the O&M Manual scrubbing media pump pressure requirements shall be kept onsite and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

7.7 Line 5 fryers 1 and 2 shall not be operated without the associated Reyco scrubber.

[IDAPA 58.01.01.405.01, 5/1/94]

Monitoring and Recordkeeping Requirements

7.8 Air Pollution Control Equipment

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to Department representatives upon request.

- The scrubbing pump pressure to the air pollution device, once daily.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

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8. APPENDIX – EMISSION RATE LIMITS AND EMISSIONS INVENTORY

The following table contains the emission rate limits for the facility.

Table 8.1 EMSSION RATE LIMITS.

	Hourly			1.0	rican Fal Emission	Charles of the second	•							
SOURCE DESCRIPTION	PN	M ₁₀ 4		PM ₁₀ *		SO ₂ *		CO		VOC*		voc*		w '
	lb/hr	Т/ут	lb/hr	T/yr	lb/hr	T/yr	Lb/h	Tlyr	lb/hr	T/yr				
Boiler No. 1			#=			·								
Boiler No. 2	_	<u></u>		_ _	+-			**	<u></u>					
Boiler No. 3						_								
Boiler No. 4							-		**	_				
Line 2 Dryer	1.50	5.97												
Line 3 Roaster	0.06	0.24					#=							
Line 3 Retrograde	0.70	2.78	4414	**	**	**		**						
Line 5 Retrograde	0.39	1.52	<u></u>											
Line 1 Dryer	2.50	9.89	**			u			<u></u>	***				
Flake Dryer 1 & 2	0.13	0.53		***		***			**					
Line 1 Reyco scrubber	3.94	15.55		-										
Line 2 Ducon scrubber	2.13	8.39						-						
Line 5 Fryer/scrubber 1	0.58	2.30			2-11		+	**		-				
Line 5 Fryer/scrubber 2	0.58	2.30					·	-						
Kice filter	0.07	0,29		**						-				
Pneumafil filter	0.30	1.17	*=	·			***							
Mikro-Pulsaire filter	0.15	0.58		**			#	-						
AMUs & space heaters							***	**						
Facility Wide Emission Limit ^{8, 9}						99.00				99.00				

¹ Pounds per hour

² Tons per year

³ As determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or the Department's emissions estimation methods used in the permit application analysis.

Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns

⁵ Sulfur dioxide

Volatile organic compound

Nitrogen oxides

⁸ Carbon monoxide (CO) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

Nitrogen oxides (NO_x) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

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The following table lists the potential emissions from all sources. This table is provided for information purposes only and is not intended to be permit limts.

Table 8.2 Emission Inventory based on PTE.

Lamb Weston, Inc American Falls Hourly (lb/hr¹) and Annual (T/yr²) Potential Emissions Limits³										
SOURCE DESCRIPTION	PM ₁₀ ⁴		\$O₂ ⁵		со		vec*		NG _X ⁷	
	Lb/h	T/yr	lb/hr	Т/ут	lb/hr	T/yr ⁸	Lb/hr	Т/ут	lb/hr	T/yr
Boiler No. 1	1.65	7.24	5.10	22.36	8.11	35.52	0.53	2.33	9.47	41.48
Boiler No. 2	0.79	3.47	2.45	10.71	3.89	17.04	0.25	1.11	9.07	39.73
Boiler No. 3	0.78	3.44	2.42	10.61	3.85	16.86	0.25	1.10	8.99	39.38
Boiler No. 4	0.02	0.08	0.002	0.006	0.21	0.92	0.01	0.06	0.25	1.10
Line 2 dryer	1.50	6.56	0.012	0.050	1,61	7.05	0.11	0.46	1.91	8.37
Line 3 Roaster	0.06	0.24	0.004	0.02	0.61	2.67	0.04	0.17	0.73	3.20
Line 3 Retrograde	0.70	3.09		-		W-A				
Line 5 Retrograde	0.39	1.67	0.003	0.01	0.40	1:73	0.03	0.11	0.47	2.06
Line 1 Dryer	2.50	10.97								
Flake Dryer 1 & 2	0.13	0.59	##	<u> </u>			<u></u>			
Line 1 Reyco scrubber	3.94	17.25	***				1.22	5.35		
Line 2 Ducon scrubber	2.13	9.31		+			0.66	2.89		<u></u>
Line 5 Fryer/scrubber 1	0.58	2.53	0.003	0.01	0.40	1.75	0.11	0.48	0.47	2.06
Line 5 Fryer/scrubber 2	0.58	2.53	0.003	0.01	0.40	1.75	0.11	0.48	0.47	2.06
Kice filter	0.07	0.32					**			
Pneumafil filter	0.30	1.29	**							
Mikro-Pulsaire filter	0.15	0.65			***				***	-
AMUs & space heaters	0.53	2.6	0.047	0.21	6.56	28.73	0.43	1.88	7.81	34.21
Fugitive Dust	3.56	7.91				**				
Facility Wide Potential ^{8, 9}		81.74	••••	43.99		99.00		16,43	-	99.00

¹ Pounds per hour

² Tons per year

As determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or the Department's emissions estimation methods used in the permit application analysis.

¹ Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns

⁵ Sulfur dioxide

Volatile organic compound

⁷ Nitrogen oxides

⁸ Carbon monoxide (CO) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

Nitrogen oxides (NO_x) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

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9. GENERAL PROVISIONS

All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.

- The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 3. The permittee shall allow the director, and/or his authorized representative(s), the following upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any
 records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms
 and conditions of this permit, to inspect any monitoring methods required in this permit, and to
 require stack emissions testing (i.e., performance tests) in conformance with state-approved or
 accepted EPA procedures when deemed appropriate by the director.
- 4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office.
- 5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the director.
- 7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the director's request shall cause the permit to be void.
- 8. The director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- Performance tests (i.e., air emissions source tests) conducted pursuant to testing requirements in this permit
 must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on
 weekends or state holidays unless the permittee obtains prior Department approval.

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The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five workdays advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation. The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emissions limit unless (1) a more restrictive operating limit is specified elsewhere in this permit or (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

10. The provisions of this permit are severable, if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.